

Barrenjoey<sup>®</sup>

# Modern Slavery Statement

Financial year ending 30 June 2025

## 1. About Us

Our mission is to produce outstanding outcomes for our clients.

Established in 2020, we have built a platform that attracts, empowers, and challenges the very best people.

Our people are owners of our business. Every single one of us is empowered to move quickly and decisively, in the interests of our client's success.

We are diversified across businesses, providing full-service capability across Equities, Research, Fixed Income, Corporate Finance (including Advisory & Capital Markets) and Private Capital.

Operating on cloud technology, we have established a powerful track record of nimble creativity, innovation, and achievement.

## 2. Our Structure and What We Do

As at 30 June 2025, we had 419 employees located in our Sydney, Melbourne, Perth, Abu Dhabi Global Market (**ADGM**) and Hong Kong offices.

Barrenjoey operates five core businesses:



### Corporate Finance

Our corporate finance team supports corporate, government, private equity, and other institutional clients by providing strategic, M&A, capital markets and financing advice.



### Equities

Our equities team supports domestic and international investors across all aspects of equity markets including cash equities (sales, trading, and execution), derivatives, and equities financing.



### Fixed Income

Our fixed income business is a market-maker and distributor of a range of fixed income rates and credit products, servicing financial institutions, government, institutional investors, and corporate clients.



### Research

Our research team provides analysis and insights on listed companies, economics, and equity strategy and offers quantitative research and database services.

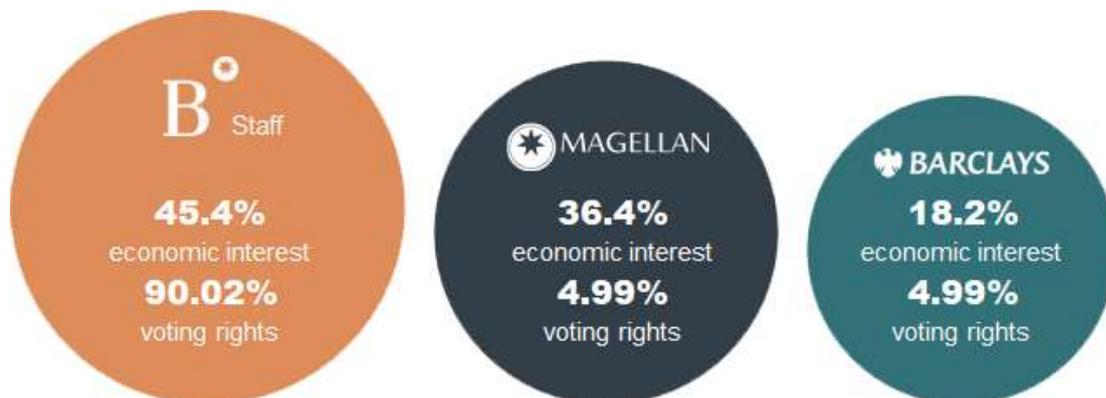


### Private Capital

Barrenjoey Private Capital connects private capital with investments in private market assets.

Barrenjoey is regulated by ASIC, AUSTRAC, ASX, FSRA, the RA and the SFC<sup>1</sup>, among other agencies. We are also required to comply with applicable laws of other jurisdictions in certain circumstances.

Our shareholding structure is set out below:



### 3. What We Stand For



#### Partnership

Partnership runs deep and lives at the core of who we are. We treat people with respect and seek their unique differences and views.



#### Big Picture

We will make decisions in the long-term interest of the partnership and our clients—never for short-term gains.



#### Right Way

We will always act with integrity and never forget we are representing our clients, our firm and Australia more broadly.



#### It's a Spade

We will always be open, authentic, and honest. We will tell clients what they need to hear, not what they want to hear.



#### Just Solve It

How we manage setbacks will define us. When things do go wrong, we won't attribute blame – we will focus on fixing the problem.



#### Have Fun

We want to have fun at work. Life is serious enough.

<sup>1</sup> FSRA: Financial Services Regulatory Authority; RA: Registration Authority; SFC: Securities & Futures Commission of Hong Kong

## 4. Identifying Modern Slavery Risks

Being a financial services business headquartered in Australia, we consider the presence of modern slavery practices in our day-to-day operations to be a very low risk.

However, we acknowledge that Barrenjoey may be indirectly exposed to modern slavery practices through our supply chain, client relationships or investments. Although we have not identified any actual instances of modern slavery, we recognise the need to continue to maintain our processes for identifying modern slavery risks.

## 5. Assessing and Mitigating Modern Slavery Risks

### 5.1 Governance

Effective governance is critical to successfully managing human rights risks, including modern slavery risks.

Barrenjoey Group's risk appetite is set out in Barrenjoey Group's Risk Management Framework.

Barrenjoey's Reputation Risk Forum, which consists of members of the Executive Committee, supports Barrenjoey's framework for assessing and managing reputation risks connected with modern slavery risks.

The Risk Committee is responsible for the oversight and supervision of the risks of non-compliance with modern slavery obligations applicable to Barrenjoey.

Barrenjoey's Workplace Health and Safety Representatives (WHSRs) in each division report to the Corporate Services team, which in turn reports to the Operating Committee. The WHSRs are responsible for identifying and reporting WHS issues/incidents within their division. The WHSRs meet on a quarterly basis to discuss any ongoing WHS issues or improvements they would like to implement.

### 5.2 Policies and guidelines

At Barrenjoey, our values are embedded in everything we do. One of our core values is to do things the "Right Way". Our policies and guidelines reflect and reinforce our values and guide Board, management and staff conduct. In addition to the policies and guidelines referenced elsewhere in this statement, the following are examples of our policies and guidelines that are relevant to modern slavery:

- **Staff Stuff that Matters** sets out what we stand for, our expectations of staff and the culture we aspire to. Before joining, all staff are required to acknowledge that they have read and understood this document.
- **Good Conduct Code** outlines Barrenjoey's vision and values. It includes expectations and guidance on how we should engage with each other, our clients, regulators, suppliers, competitors, and the broader community. The Code aims to support a culture in which acting ethically and with integrity is engrained in our workforce. Before joining, all staff are required to acknowledge that they have read and understood this document.
- **Barrenjoey Group Risk Management Framework** encompasses the principles, policies, systems, structures, processes, and people who are responsible for identifying, measuring, evaluating, monitoring, reporting, and controlling or mitigating all internal and external sources of material risks.
- **Reputation Risk Policy** articulates the risk management and control processes which need to be met to effectively manage and mitigate reputation risks faced by Barrenjoey. The Policy identifies that reputation risk may arise from being associated with entities that do not manage social issues including human rights matters such as worker rights, health and safety, labour relations, modern slavery and child labour. The Policy makes clear that the primary responsibility for the identification, assessment, management and monitoring of reputation risk and if necessary, the escalation, referral or reporting of such risk matters resides with individual employees, as the primary risk owners. Our Reputation Risk Policy includes a Modern Slavery Standard. The purpose of the Standard is to explain modern slavery and the related reputation risks which may arise in a Barrenjoey context. The Standard also provides guidance on the circumstances in which modern slavery risks or concerns should be escalated to Barrenjoey's Reputation Risk Forum.
- **Whistleblower Policy – 'Speak Up'** encourages staff to raise concerns and feel comfortable to 'speak up' if they become aware of information or activity that is wrong, illegal, or unethical. The Policy provides a range of channels to report suspected or actual misconduct. Reports may be made on a disclosed or anonymous basis. The Policy also sets out the process to be followed to investigate whistleblower reports, which are taken seriously and investigated thoroughly and promptly. Barrenjoey does not tolerate retribution of any kind against staff who have made, or are suspected of having made, a whistleblower report.
- **Client Complaints Policy** sets out the framework and associated procedures for handling client complaints transparently and efficiently, and in accordance with Barrenjoey's expectations, good business practice and regulatory expectations.

- **Compliance and Anti-Financial Crime Framework** describes the infrastructure Barrenjoey has put in place to detect, mitigate, and manage compliance and financial crime risks. Barrenjoey recognises that there is a link between financial crime risk and human rights violations.
- **Consequence Management Policy** sets out the processes to be followed to assess, escalate, investigate, and report any suspected inappropriate, unethical or unlawful staff behaviour.
- **Work, Health and Safety Policy** sets out the processes and resources Barrenjoey has put in place to safeguard the health, safety, and wellbeing of its employees, contractors, casual staff and visitors.
- **Remuneration Policy** sets out Barrenjoey's no tolerance stance for discrimination based on gender. The Policy further requires that remuneration decisions are made objectively, ensuring that employees who perform similar roles are paid equitably for a comparable level of performance and contribution. Barrenjoey performs pay reviews at least annually with a focus on gender pay equity.
- **Business Approval Policy (BAP)** sets out Barrenjoey's approval process to enable Barrenjoey to enter into new products and services and address the resultant impact on the operating environment.
- **Transaction Approval Policy** sets out Barrenjoey's approval process that is required prior to Barrenjoey entering into significant bespoke transactions that potentially give rise to heightened risk.

The above policies and guidelines are generally reviewed at least every two years depending on the policy/guideline.

We have uplifted our policy governance processes to require policy owners to specifically consider ESG considerations, including modern slavery when Barrenjoey policies are reviewed and published.

### 5.3 Our Supply Chain

A significant amount of our supplier spend is dedicated to technology, professional services and building and office services.

The areas of our supply chain that are recognised as being more susceptible to modern slavery risks are: information technology, office equipment/products, brand/marketing, and hospitality/entertainment. These industries are often staffed by lower or unskilled vulnerable groups (including migrants), have weak labour regulations, and/or involve the manufacture and sale of goods sourced from countries with high instances of modern slavery.

#### 5.3.1 Onboarding new suppliers

Our **Corporate Services Procurement Policy** requires that Barrenjoey undertake due diligence on material prospective suppliers. The diligence must involve consideration of modern slavery or human trafficking in the supplier's supply chains.

Our **Outsourcing and Supplier Management Policy** mandates the inclusion of clauses against modern slavery in outsourcing or supplier arrangements which are considered material or relate to a material business activity and/or critical business service.

Our **Request for Proposal (RFP)** documents include questions about the supplier's approach to modern slavery risks. The questions are designed to identify risks to people and whether appropriate systems and controls are in place to prevent harm. Our RFP documents include a question regarding the location of the supplier's operations for the services intended to be provided to Barrenjoey. By understanding the locations in which our suppliers operate, we are better able to assess potential modern slavery risks associated with those suppliers.

#### 5.3.2 Supplier Code of Conduct

Our **Supplier Code of Conduct** is referenced in our standard supplier contract terms and is also available on our external website. Barrenjoey considers our suppliers to be an extension of our business and recognise their contribution to our good reputation and success. As such, we expect our suppliers to act with integrity and to demonstrate a commitment to ethical business practices. The Supplier Code of Conduct sets out the standards of business conduct with which our suppliers are expected to comply, including in respect of human rights, the environment and diversity & inclusion. Suppliers are expected to immediately report any non-compliance with the Code to their Barrenjoey contact. Barrenjoey reserves the right to reconsider our business relationship with any supplier found not to be compliant with the Code. The Code includes reference to Barrenjoey's whistleblower reporting portal, where suppliers may make anonymous reports.

All of our existing material suppliers have been asked to acknowledge the Supplier Code of Conduct. Where we do not obtain an acknowledgement from a material supplier, the supplier is either not onboarded or is otherwise subjected to an escalated risk assessment process by appropriate personnel. The assessment process involves consideration of the prospective supplier's circumstances including for example, the size, maturity and obligations of the organisation. Onboarding following this assessment is conditional upon a supplier being deemed as presenting a low risk of modern slavery.

#### 5.4 Client onboarding and ongoing monitoring

Barrenjoey's client onboarding procedures and ongoing client monitoring are, among other things, aimed at identifying clients the subject of environmental, human rights or financial crime (including money laundering) controversies. Barrenjoey assigns a risk rating to all prospective and existing clients. As part of the risk rating process, we screen all clients against an extensive set of media and government sources. Clients identified as being associated with environment/human rights/financial crime controversies may be assigned a high-risk rating.

Clients identified as high-risk are subject to heightened due diligence and require senior management sign-off before they can be on-boarded.

#### 5.5 Investments

The Barrenjoey Private Capital Investment Committee is responsible for considering and monitoring investment risks including ESG and modern slavery risks relating to investments managed by Barrenjoey Private Capital Management Pty Limited.

#### 5.6 Training

Barrenjoey communicates our expectations around staff behaviour and how staff can raise any issues or concerns by holding an induction for all new starters, which covers Barrenjoey's values and expected conduct. Barrenjoey also provides regular training (including mandatory training) on our policies, procedures, and guidelines. This includes B\* Compliance & AFC training, anti-financial crime training (which covers AML, sanctions, fraud, anti-corruption, and whistleblowing) and Stuff that Matters training. Barrenjoey tracks staff completion of mandatory training to ensure compliance.

In FY25, modern slavery training continued to be offered to all Barrenjoey staff members, with the introduction of an online learning platform which provides year-round access to training. The training is intended to increase awareness of the different types of modern slavery, highlight real-world examples of modern slavery, describe how businesses can identify and address modern slavery risks and explain the reporting obligations under the *Modern Slavery Act 2018* (Cth). The training modules are expected to be regularly reviewed and updated including to address changes in Australian laws and standards.

### 6. Ongoing Plans

At Barrenjoey we aim for continuous improvement to meet the high standards we set for ourselves. Barrenjoey continues to develop its systems and processes commensurate with our maturity. We acknowledge that, as the volume of Barrenjoey's activities increases, our guidelines and screening processes applicable to our clients, supply chains and investments will need to evolve to continue to identify modern slavery risks.

### 7. Assessing Effectiveness of Our Actions

Barrenjoey maintains policies, processes, and procedures to identify and monitor modern slavery risks in our operations, investments, and supply chains. As we mature, we will continue to enhance these processes and procedures.

We continue to deploy our operational risk framework which will seek to ensure a robust assessment process of the effectiveness of our response to modern slavery risks.

As any improvement opportunities are identified during this process, we will seek to ensure these are reviewed and addressed.

In FY25, there were no modern slavery incidents (suspected or actual) reported through whistleblowing channels.

### 8. Consultation and Approval

This statement was prepared with the assistance of, and in consultation with, a cross-functional team from our relevant business and infrastructure areas.

The Risk Committee and Executive Committee of the reporting entities were consulted and given the opportunity to provide feedback on this statement before it was considered and approved by each board of the reporting entities, listed in Appendix 1.

### 9. About this statement

This modern slavery statement sets out the steps we have taken to identify, mitigate and address the risks of modern slavery in our operations and supply chain.

Modern Slavery Statement

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This statement is prepared and issued by Barrenjoey Capital Partners Group Holdings Pty Limited on behalf of the reporting entities listed in Appendix 1.

This statement is given pursuant to the *Australian Modern Slavery Act 2018* (Cth) and covers the period 1 July 2024 to 30 June 2025.

*Brian Benari*

**Brian Benari**  
**Director and Chief Executive Officer**

Barrenjoey Capital Partners Group Holdings Pty Limited  
Barrenjoey Capital Partners Group Pty Limited  
Barrenjoey Capital Partners Pty Limited  
Barrenjoey Advisory Pty Limited  
Barrenjoey Markets Pty Limited  
Barrenjoey Services Pty Limited

Date: 16 December 2025

## **Appendix 1: Reporting Entities for the Group**

Barrenjoey Capital Partners Group Holdings Pty Limited

Barrenjoey Capital Partners Group Pty Limited

Barrenjoey Capital Partners Pty Limited

Barrenjoey Advisory Pty Limited

Barrenjoey Markets Pty Limited

Barrenjoey Services Pty Limited

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